

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES OF AMERICA)	
)	
v.)	
)	Case No. 19-cr-10335-DJC
TANMAYA KABRA,)	
Defendant.)	
)	
_____)	

ASSENTED-TO MOTION FOR LEAVE TO FILE UNDER SEAL

The Government, by and through undersigned counsel, hereby moves the Court for leave to file its Opposition to the Defendant's Motion to Modify the Conditions of Pre-Trial Release (Dkt. No. 94) under seal.

The Government seeks leave to file under seal for the following reasons:

- *First*, the Opposition, along with its exhibits, discusses the defendant's sensitive personal medical information.
- *Second*, the Opposition and exhibits also identify and describe a victim of Mr. Kabra's fraudulent scheme.
- *Third*, the Opposition and exhibits include financial information and records which, by their nature, are sensitive and private.

Accordingly, the Government requests leave to file its Opposition under seal pursuant to Local Rule 83.6.11(b).

Counsel for the defendant has assented to this Motion.

Respectfully submitted,

UNITED STATES OF AMERICA,

By its attorney,

ANDREW E. LELLING
United States Attorney

/s/ Christopher Looney
Christopher Looney
Assistant United States Attorneys
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Dated: July 16, 2020

CERTIFICATE OF SERVICE

Undersigned counsel certifies that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Christopher Looney
Christopher Looney
Assistant United States Attorney

Dated: July 16, 2020